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July 13, 2022

**BY ECF**

Hon. Lewis J. Liman  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl St., Courtroom 15C  
New York, NY 10007-1312

Re: *Jane Doe 1 and Jane Doe 2 v. Branca USA, Inc. et al.*  
Civ. No. 22-cv-3806-LJL

Dear Judge Liman:

This firm represents defendants Branca USA, Inc. and Edoardo Branca (the “U.S. defendants”) in the above-referenced action. We write on behalf of the U.S. defendants and plaintiffs Jane Doe 1 and Jane Doe 2 (the “Plaintiffs”) to request that the time for all defendants, including for defendant Fratelli Branca Distillerie S.p.A. (“Fratelli”), to answer, move with respect to, or otherwise respond the complaint (hereafter, “respond to the complaint”) in this action be extended to September 16, 2022.

Each defendant waived service of a summons. The U.S. defendants must respond to the complaint by July 15, 2022 and Fratelli must respond to the complaint by August 17, 2022. Our office filed a notice of appearance for the U.S. defendants on July 12, 2022 and requests an extension to September 16, 2022 to respond to the complaint. Plaintiffs have consented to this request.

No counsel has entered an appearance for Fratelli as of today’s date. Plaintiffs and the U.S. defendants, however, prefer to coordinate the time for all defendants to respond to the complaint to be for the same date, and, therefore, jointly request that the time for each defendant to respond to the complaint be extended to September 16, 2022.

Respectfully,

/s/ Roger Maldonado  
Roger Maldonado

cc: All Counsel of Record (via ECF)